



REC'D TO  
REGULATORY AUTH.

BellSouth Telecommunications, Inc.  
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Guy M. Hicks  
General Counsel

'99 AUG 10 PM 4:28

August 10, 1999

EXECUTIVE SECRETARY

VIA HAND DELIVERY

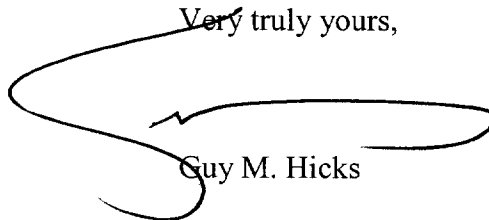
David Waddell, Executive Secretary  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37238

Re: *Proceeding for the Purpose of Addressing Competitive Effects of Contract Service Arrangements Filed by BellSouth Telecommunications, Inc. in Tennessee*  
Docket No. 98-00559

Dear Mr. Waddell:

Enclosed are the original and thirteen copies of BellSouth Telecommunications, Inc.'s Response to the Motion of AT&T to Remove Certain Documents from the Status of "Confidential" Under the Protective Order. Copies of the enclosed are being provided to counsel of record for all parties.

Very truly yours,



Guy M. Hicks

GMH:ch  
Enclosure

**BEFORE THE TENNESSEE REGULATORY AUTHORITY**  
**Nashville, Tennessee**

In Re:        *Proceeding for the Purpose of Addressing Competitive Effects of Contract Service Arrangements Filed by BellSouth Telecommunications, Inc. in Tennessee*  
Docket No. 98-00559

*BellSouth Telecommunications, Inc.'s Tariff to Offer Contract Service Arrangement TN98-6766-00 for Maximum 13% Discount on Eligible Tariffed Services*  
Docket No. 98-00210

*BellSouth Telecommunications, Inc.'s Tariff to Offer Contract Service Arrangement KY98-4958-00 for an 11% Discount on Various Services*  
Docket No. 98-00244

**BELLSOUTH TELECOMMUNICATIONS, INC.'S**  
**RESPONSE TO THE MOTION OF AT&T TO REMOVE**  
**CERTAIN DOCUMENTS FROM THE STATUS OF**  
**"CONFIDENTIAL" UNDER THE PROTECTIVE ORDER**

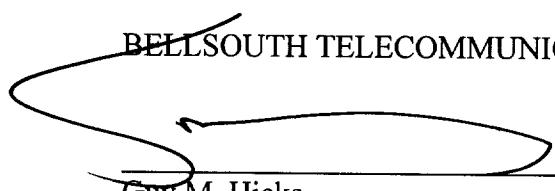
BellSouth Telecommunications, Inc. ("BellSouth") hereby responds to the Motion of AT&T Communications of the South Central States, Inc. ("AT&T") to remove the following documents from the status of "Confidential": (1) CSA KY98-4958-00 and CSA TN98-2766-00, with the customers' names redacted; and (2) the list of 33 documents produced by BellSouth in discovery and identified by Bates Stamp numbers in AT&T's Motion.

BellSouth has no objection to AT&T's use of the two designated CSAs with the customers' names redacted during next week's hearing, pursuant to Paragraph 9 of the Protective Order. Similarly, BellSouth has no objection to AT&T's use of the 33 documents set forth in AT&T's motion during next week's hearing, pursuant to Paragraph 9 of the Protective Order. This will allow the hearing to go forward next week in an expeditious manner while still protecting BellSouth's proprietary interests.

BellSouth, however, objects to any request that these documents be made public. Neither AT&T nor other parties to this docket are harmed by maintaining the status quo: all parties to this docket may use such information during the hearing pursuant to the terms of the Protective Order. BellSouth, however, would suffer competitive harm if it were required to "publicize" documents that reveal BellSouth's competitive strategies and its negotiation processes to the general public (including AT&T and its other competitors, who clearly do not "publicize" their analogous strategies and processes).

Respectfully submitted,

BELLSOUTH TELECOMMUNICATIONS, INC.



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Douglas Lackey  
Bennett L. Ross  
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CERTIFICATE OF SERVICE

I hereby certify that on August 10, 1999, a copy of the foregoing document was served on the parties of record, via the method indicated:

- ☒ Hand
- ☐ Mail
- ☐ Facsimile
- ☐ Overnight

Richard Collier, Esquire  
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- ☒ Hand
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- ☒ Hand
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James Lamoureux, Esquire  
AT&T  
1200 Peachtree St., NE  
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- ☒ Hand
- ☐ Mail
- ☐ Facsimile
- ☐ Overnight

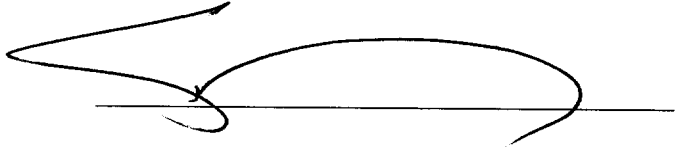
Vance Broemel, Esquire  
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Nashville, TN 37243

- ☐ Hand
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A handwritten signature in black ink, featuring a large, stylized loop and a horizontal line extending to the right.